

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Editorially amend independent claim 1 in non-narrowing fashion.
2. Cancel claims 11-13 without prejudice or disclaimer.
3. Correct the claim numbering of the last two claims (to be claims 18 and 19, as noted in the second enumerated paragraph of the office action).
4. Respectfully traverse all prior art rejections.
5. Advise the Examiner of the simultaneous filing of a Petition to Extend.

B. PATENTABILITY OF THE CLAIMS

Claims 1-15 and 18-19 stand rejected under 35 USC 102(e) as being anticipated by U.S. Patent 7,127,250 to Gallagher et al. All prior art rejections are respectfully traversed for at least the following reasons.

Independent claims 1 and 14 both require the registration by an access controller of mobile station identification information in association with address information for the mobile station on the broadband network. More specifically, claim 1 reads, "*said access controller is associated with one or more location areas in said licensed radio mobile network and comprises a database for storing the identification of mobile stations in association with address information of said mobile station on said broadband network*", while claim 14 reads, "*registering said mobile station identification information in association with said mobile station network address on said broadband network*".

The office action asserts that Gallagher discloses the registration of such address information, and in particular argues that the registration procedure conducted in the indoor access network (IAN) disclosed in Gallagher results in the storage of associated broadband network address and identification information of mobile stations in a database within the indoor network controller. The office action refers to col. 13, lines 17 to 32 as a disclosure of the address information for the mobile station known by the indoor network controller 132 (equated with the access controller of the claims of the subject application).

The office action is entirely mistaken. The parameters listed in the cited Gallagher passage are the indoor access network local area identification (IAN-LAI), routing area identification (IAN-LAI), and cell identification (IAN-CI). These parameters are not broadband network address parameters. Rather, they are well-known and well-understood identifiers of a cellular mobile network.

There is no recognized equivalent for these Gallagher parameters on a broadband network. More specifically, after reading the disclosure of Gallagher it is not possible to infer that these parameters should be resolved into a network address on the broadband network. In other words, Gallagher uses parameters recognized in licensed mobile networks such as GSM or GPRS. How these are used in practice in the indoor access network is not described by Gallagher, it can only be assumed that the indoor access network is provided with cellular structure analogous to that of licensed mobile networks.

Additionally, and as argued previously, there is no disclosure in Gallagher of the deletion of the stored identification and address information when the mobile station ceases to operate in the coverage area of the indoor network. More specifically, Gallagher fails to disclose that *said access controller [is] adapted to delete said identification data when said mobile station ceases to operate in the coverage areas of said unlicensed radio*

access network in accordance with claim 1 and the step of *deleting said mobile station identification information when it is determined that a connection is no longer maintained* in accordance with claim 14 of the subject application.

The office action again cites the paragraph bridging columns 16 and 17, and additionally refers to col. 15, lines 42 to 45. The first mentioned paragraph describes the detachment and deregistration of a mobile station from the indoor network. However, the sole reference to the function of the indoor network controller when deregistration is signalled is to change "the mobile station state to 'Inactive' or a similar state" (see col. 17, lines 22-24).

The office action also states at page 3 thereof that, according to Gallagher, the indoor base station 128 releases all resources associated with the mobile station (supposedly described at col. 17, lines 20-22). However, the indoor base station 128 is not the indoor network controller 132, which has been equated with the network controller of the present claims. Consequently, the only information provided by Gallagher is that the indoor network controller changes the mobile state to "Inactive". This is not equivalent to deleting the stored identification information as defined in claims 1 and 14 of the subject application. The reference to the function of the MSC described at col. 15, lines 42 to 45 of Gallagher (with reference to the registration of a mobile station with the indoor access network) does not appear to be relevant to the later cited passage.

For the above reasons, Gallagher fails to disclose an access controller comprising an access controller that comprises *"a database for storing the identification of mobile stations in association with address information of said mobile station on said broadband network"* and which is *"adapted to delete said identification data when said mobile station ceases to operate in the coverage areas of said unlicensed radio access network"*

in accordance with claim 1 of the subject application, nor the step of "*registering said mobile station identification information in association with said mobile station network address on said broadband network and deleting said mobile station identification information when it is determined that a connection is no longer maintained*" in accordance with claim 14 of the subject application.

C. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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